

### **REMARKS**

Claims 1-60 are pending. Claims 1-60 have been rejected. Claims 1, 13, 17, 21, 33, 37, 43, 49, and 55 have been amended. Claims 12, 22, 26, and 32 have been canceled. No new matter has been added.

Claims 1-3, 5, 7, 8, 10, 11, 21, 22, 26-28, 30, 37-39, 41, 43-45, 47, 49-51, 53, 55-57, and 59 have been rejected under 35 U.S.C. § 102(e) as being anticipated by Anglin et al. (US 2004/0199521). Claims 12-20 and 32-36 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Anglin in view of Chang et al. (US 6,578,046). As noted above, claims 12, 22, 26, and 32 have been canceled, thereby obviating their rejections. It is respectfully submitted that claims 1-3, 5, 7, 8, 10, 11, 13-21, 27, 28, 30, 33-39, 41, 43-45, 47, 49-51, 53, 55-57, and 59 are allowable over the art of record for the reasons set forth below.

Claim 1 is directed to a computer system that comprises items and item folders, along with a hardware/software interface system for manipulating the items. Each item belongs to at least one of the item folders. Claim 1 has been amended to include the features of a plurality of categories, where at least one of the items belongs to a category. The item folders and the categories are arranged in a directed graph structure (see application, as originally filed, e.g. at paragraph [0111]). The prior art fails to disclose or suggest such features.

Anglin is directed to the storage of objects using storage information that indicates at least one group associated with the storage object. Each storage object is capable of being associated with a plurality of groups and different group types. Group information is provided for each group indicating a group identifier, storage objects associated with the group, and a group type. As acknowledged by the Examiner on page 21, section 40 of the Office Action (with respect to dependent claim 12), Anglin fails to teach a plurality of categories, wherein said categories constitute an organizational structure for the items. Moreover, Anglin is completely silent regarding directed graph structures.

The Office Action then states (with respect to dependent claim 12) that Chang teaches “a plurality of Categories comprising at least Category, wherein said plurality of Categories constitute an organizational structure for said Items”. The Office Action refers to the Federated Collection of Chang and the description in Chang, column 13, lines 26-30. According to Chang, a Federated Collection is a collection of results objects, where each

results object contains the results of a subquery. A Federated Collection allows an application to process a collection of objects resulting from a query. Several collections of data objects may be aggregated and these collections may be treated as one whole unit of collection. However, neither the federated collection nor the results objects or collections of objects are arranged in a directed graph structure, as claimed.

Claims 21, 37, 43, 49, and 55 have been amended and include similar features to those described above with respect to claim 1. Based on the foregoing, claims 1, 21, 37, 43, 49, and 55 should not be rejected as being anticipated by Anglin (or as unpatentable over Anglin in view of Chang). Thus, claims 1, 21, 37, 43, 49, and 55, along with their dependent claims, are patentable for the reasons set forth above. Withdrawal of the rejections of claims 1-3, 5, 7, 8, 10, 11, 21, 27, 28, 30, 37-39, 41, 43-45, 47, 49-51, 53, 55-57, and 59 under 35 U.S.C. § 102(e), and the rejections of claims 13-20 and 33-36 under 35 U.S.C. § 103(a), is respectfully requested.

Claims 4, 6, 9, 11, 29, 31, 40, 42, 46, 48, 52, 54, 58, and 60 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Anglin in view of Edwards (US 2004/0073560). It is respectfully submitted that claims 4, 6, 9, 11, 29, 31, 40, 42, 46, 48, 52, 54, 58, and 60 are allowable over the art of record for the reasons set forth below.

Claims 4, 6, 9, 11, 29, 31, 40, 42, 46, 48, 52, 54, 58, and 60 are variously dependent from claims 1, 21, 37, 43, 49, and 55, and are therefore patentable for the reasons set forth above with respect to these claims. Edwards fails to cure the deficiencies of Anglin and Chang. Edwards describes file synchronization by using a folder tree descriptive of each set of folders that is stored at various locations, but fails to teach or suggest the directed graph structure as claimed. Therefore, withdrawal of the rejections of claims 4, 6, 9, 11, 29, 31, 40, 42, 46, 48, 52, 54, 58, and 60 under 35 U.S.C. § 103(a) is respectfully requested.

Claim 23 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over Anglin in view of Beauregard et al. (US 6,438,545). Claim 24 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over Anglin in view of Gordon and Syme (Typing a Multi-Language Intermediate Code). Claim 25 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over Anglin in view of Judge et al. (US 6,430,564). It is respectfully submitted that claims 23-25 are allowable over the art of record for the reasons set forth below.

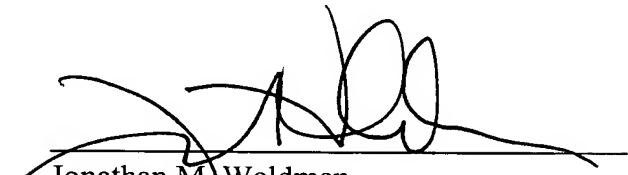
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**PATENT**

Claims 23-25 are dependent from claim 21, and are therefore patentable for the reasons set forth above. Beauregard, Gordon and Syme, and Judge, each fail to cure the deficiencies of Anglin and Chang. Beauregard describes a user interface, Gordon and Syme describes rules for an intermediate language, and Judge describes a data manager. However, none of these prior art references teach or suggest the directed graph structure as claimed. Therefore, withdrawal of the rejections of claims 23-25 under 35 U.S.C. § 103(a) is respectfully requested.

In view of the foregoing amendments and remarks, Applicants submit that the above-identified application is in condition for allowance. Early notification to this effect is respectfully requested.

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